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August 5, 2014

VIA ECF

Hon. Katharine S. Hayden, U.S.D.J.
United States District Court
District of New Jersey
Frank R. Lautenberg U.S.P.O. & Courthouse
One Federal Square
Newark, New Jersey 07102

Re: NXIVM Corporation, et al. v. Sutton, et al.
Docket No. 06-CV-1051 (KSH) (MF)

Dear Judge Hayden:

This firm is counsel of record for cross-claim defendant Kristin Keeffe in the above matter. We write pursuant to Magistrate Judge Falk's July 29, 2014 letter to all counsel.

Ms. Keeffe has no affirmative claims pending in this case. A single cross-claim brought by defendant Rick Ross for intrusion upon seclusion is pending against Ms. Keeffe. Mr. Ross has sought leave to dismiss this claim, at which time Ms. Keeffe would no longer be a party to this action. Ms. Keeffe has also moved for summary judgment on Mr. Ross's claim, which motion is unopposed and pending a decision by the Court.

We thank the Court for its consideration of this matter.

Respectfully submitted,



John M. Falzone

cc: Hon. Mark. Falk, U.S.M.J.
All Counsel (via ECF)